IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. **WESLEY ADAM UPCHURCH**, Defendant.	No. 13-04052-14-CR-C-BCW

JOINT MOTION TO CONTINUE TRIAL DATE

COMES NOW the United States of America, by and through Thomas A. Larson, the Acting United States Attorney for the Western District of Missouri and, pursuant to the Speedy Trial Act, hereby files a joint motion to continue the trial of this matter from July 17, 2017, to September 25, 2017, in order to maintain continuity of government counsel and in the interest of justice.

I. Factual Background

On March 16, 2016, a federal grand jury sitting in Jefferson City, Missouri, returned a Third Superseding Indictment, charging the defendant with multiple counts involving: conspiracies to smuggle goods; to commit mail fraud; to distribute controlled substance analogues; to commit money laundering; and substantive offenses related to the manufacture of controlled substance analogues and money laundering. (D.E. 581). This matter is currently set for trial on July 17, 2017; however, the defendant's motion (D.E. 687) was ruled April 20, 2017.

II. Joint Request for Continuance

The Government and the defendant request that the Court enter an Order pursuant to the Speedy Trial Act continuing the trial until September 25, 2017.

III. Conclusion

Wherefore, the Government respectfully requests that this Court grant the relief requested herein.

Respectfully submitted,

Thomas M. Larson
Acting United States Attorney

By /S/

Michael S. Oliver
Assistant United States Attorney
Missouri Bar No. 41832

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on April 21, 2017, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/S/
Michael S. Oliver
Assistant United States Attorney